

Marc V. Kalagian
Attorney at Law: 4460
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802
Tel.: (562)437-7006
Fax: (562)432-2935
E-mail rohlfin.kalagian@rksslaw.com

Attorneys for Plaintiff
GILBERTO GUZMAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GILBERTO GUZMAN,)	Case No.: 3:13-cv-0069-MMD-WGC
)	
Plaintiff,)	UNOPPOSED MOTION TO AMEND
)	AND EXTEND BRIEFING
vs.)	SCHEDULE
)	
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant ¹)	

Plaintiff GILBERTO GUZMAN (“Plaintiff”), through his undersigned
counsel of record, requests the approval of the Court, to extend the time for
Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to August 21, 2013;

¹ Carolyn W. Colvin became the Acting Commissioner of Social Security on
February 14, 2013. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure,
Carolyn W. Colvin should be substituted for Michael J. Astrue as the defendant in
this suit. No further action need be taken to continue this suit by reason of the last
sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 and that Defendant shall have until September 18, 2013, to file his opposition, if
2 any is forthcoming. Any reply by plaintiff will be due September 30, 2013.

3 An extension of time for plaintiff is needed due to a serious illness. The
4 spouse of the associate in Counsel's firm who this matter is assigned to receives
5 chemotherapy treatment for her Stage IV breast cancer which metastasized initially
6 to her liver and has now spread to her lungs and spine. Counsel requires the
7 additional time to file the Motion for Remand to allow the assigned attorney the
8 appropriate time to assist his Spouse and his two kindergarten and pre-school aged
9 children through this obviously stressful experience.

10 Counsel for defendant has indicated, via e-mail, that this motion to extend
11 the time to file is not opposed.

12
13 DATE: July 1, 2013,

Respectfully submitted,

14 ROHLFING & KALAGIAN, LLP

15 /s/ *Marc V. Kalagian*

16 BY: _____

Marc V. Kalagian

17 Attorney for plaintiff GILBERTO GUZMAN
18
19
20
21
22
23
24
25
26

1
2 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
3 and including August 21, 2013, in which to file Plaintiff's Motion for Reversal
4 and/or Remand; Defendant may have an extension of time to September 18, 2013
5 to consider the contentions raised in Plaintiff's Motion, and file any opposition if
6 necessary. Any reply by plaintiff will be due September 30, 2013.

7 IT IS SO ORDERED.

8 **DATED: July 9, 2013.**

9 

10

THE HONORABLE WILLIAM G. COBB
11 UNITED STATES DISTRICT JUDGE
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26